

From: [Bondy, Garret E](#)
To: [Saric, James](#)
Cc: [Abid, Joseph A](#); [Bondy, Garret E](#); [Chase Fortenberry](#); [Garry Griffith](#); [Jeff Keiser](#); [Jessica Winter](#); [Judith Alfano](#); [Julie Sims](#); [Kathryn Huibregtse](#); [Martin Lebo](#); [Berkoff, Michael](#); [Paul Bucholtz](#); [Mendoza, Ramon](#); [Richard Gay](#); [Sharon Hanshue](#); [Todd.Goeks@noaa.gov](#)
Subject: Kalamazoo River Superfund Site - July 2013 Monthly Progress Report, Feb-July 2013 Semi-Annual Progress Report, and Master Schedule Update
Date: Thursday, August 15, 2013 2:07:30 PM
Attachments: [07 2013 Monthly SRIFS Semi-Annual Master Schedule Update.pdf](#)

Dear Mr. Saric,

On behalf of Mr. Chase Fortenberry and Georgia-Pacific LLC, this email transmits the July 2013 Monthly Progress Report (report #77), the February-July 2013 Semi-Annual Progress Report (report #13), and an evaluation and update of the project master schedule, dated August 2013. Hard copies of this submittal have also been sent via overnight courier to your and Mr. Bucholtz's attention.

Please contact Mr. Fortenberry with any questions you may have concerning this submittal.

Regards,

Garret E. Bondy, PE
AMEC Environment & Infrastructure
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August 15, 2013

Mr. James Saric
Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3511

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Progress Report, July 2013 and
Thirteenth Semi-Annual Progress Report (February 2013 to July 2013)

Dear Jim:

Attached are the 77th monthly and 13th semi-annual progress reports for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). The monthly progress report is submitted per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-07-C-864, and Section 7.1 of the associated Statement of Work (SOW). This report is also submitted per Paragraph 19a of the 2007 AOC for Removal Action (Docket No. V-W-07-C-863) and Paragraph 19a of the 2009 AOC for Removal Action (Docket No. V-W-09-C-925). The semi-annual progress report is submitted per Section 7.2 of the SOW associated with the February 2007 AOC for RI/FS.

Also attached is the master schedule for SRI/FS activities at the Site, which has been reviewed and updated per Section D of Exhibit A of the SOW.

If you have any questions, please do not hesitate to contact me.

Sincerely,



L. Chase Fortenberry, PG
Manager – Environmental Engineering, Environmental Affairs
Georgia-Pacific LLC

Attachments

cc: Michael Berkoff, USEPA
Ramon Mendoza, USEPA
Paul Bucholtz, MDEQ
Judith Alfano, MDEQ

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Garret E. Bondy, P.E., AMEC E&I, Inc.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #77, JULY 2013

Significant Developments and Activities during the Period:

- On July 2, 2013, representatives from Georgia-Pacific, AMEC, USEPA, and MDEQ attended a conference call to discuss the *Area 3 SRI/FS Supplemental FSP* comments which were received via email from MDEQ on June 27, 2013.
- On July 8, 2013, Georgia-Pacific received USEPA approval of the revised *Area 3 SRI/FS Supplemental FSP*.
- On July 9, 2013, AMEC, on behalf of Georgia-Pacific, submitted an email to USEPA and MDEQ which contained responses to the June 27, 2013 MDEQ *Area 3 SRI/FS Supplemental FSP* comments.
- On July 11, 2013, AMEC and Georgia-Pacific submitted AMEC's Site-Specific Health and Safety Plan (HASP) to USEPA, which was prepared to facilitate river-wide SRI/FS activities at the site.
- On July 12, 2013, Georgia-Pacific submitted a letter to USEPA describing the revised sample identification nomenclature system which would be used for SRI/FS sampling activities beginning with the activities outlined in the *Area 3 SRI/FS Supplemental FSP*.
- In July 2013, AMEC secured access agreements with multiple residential properties within Area 3 and with US Gypsum for the island near the Otsego Paper facility located at the eastern end of Area 3.
- Field activities outlined in the USEPA approved *Area 3 SRI/FS Work Plan and Supplemental FSP* were initiated on July 15, 2013.
- The revised *Draft Area 1 FS* was submitted electronically to USEPA on July 29, 2013.
- The project Work Group has continued periodic meetings and is continuing to demonstrate progress with respect to Area 2 SWAC calculation methodologies.
- Georgia-Pacific awaits the following:
 - USEPA's approval of the final *Former Plainwell Impoundment and Plainwell No. 2 Dam Area Bank Conditions Monitoring Report*, submitted December 31, 2012.
 - MDEQ's complete response to the January 9, 2013 Freedom of Information Act request.
 - USEPA notice of approval or disapproval and comments on the revised *Draft Area 1 FS*, submitted July 29, 2013.

Data Collected and Field Activities Conducted during the Period

- Field activities outlined in the USEPA approved *Area 3 SRI/FS Work Plan and Supplemental FSP* were initiated on July 15, 2013.

Laboratory Data Received during the Period

- None.

Problems

- None.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #77, JULY 2013

Actions Taken to Correct Problems

- None.

Developments Anticipated during the Next Two Reporting Periods

- Georgia-Pacific anticipates receipt of USEPA notice of approval or disapproval on the revised *Draft Area 1 FS*.
- Georgia-Pacific anticipates a meeting with USEPA and MDEQ the week of August 26, 2013 to discuss the revised *Draft Area 1 FS* and potential agency comments.
- Georgia-Pacific anticipates collection of remaining samples in Pine Creek portion of Area 3 on August 21, 2013.
- Georgia-Pacific anticipates receipt of laboratory data from the Area 3 Supplemental FSP field activities.
- Follow-up information on the angular armor rock used and the survival of the live stakes planted in the former Plainwell Impoundment during December 2012 will be submitted to USEPA within the next two reporting periods.
- Georgia-Pacific plans to submit the *Draft 2013 Bank Condition Monitoring Report for the Plainwell No. 2 Dam Area* to USEPA for review during the month of August.
- Georgia-Pacific plans to submit the revised *Draft Area 2 SRI Report* to USEPA for review during the month of November.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #13, FEBRUARY 2013 TO JULY 2013

Areas of the Site where SRI/FS activities have been performed pursuant to the February 2007 AOC and SOW:

- Operable Unit 5 (OU 5) – Kalamazoo River from Morrow Dam to Lake Michigan and Portage Creek from Alcott Street to its confluence with the Kalamazoo River.

Summary of overall progress in completion of work required by the AOC and SOW – Multi-Area and Areas 1-4:

Multi-Area

- On February 15, 2013, ARCADIS submitted the 10th semi-annual progress report for Areas 1 through 3 and 6th annual progress report for Areas 4 through 7.
- On February 20, 2013, USEPA, MDEQ, and Georgia-Pacific met in Detroit, Michigan to discuss the Area 1 FS comments, Area 3 SRI data, the schedule for other SRI/FS activities, and Georgia-Pacific's plans for replacing ARCADIS as the primary consultant performing the SRI/FS work.
- On February 25, 2013, Georgia-Pacific forwarded to USEPA the soil/sediment ecological screening criteria tables used in the preliminary review of non-PCB constituents.
- On March 22, 2013, Georgia-Pacific notified USEPA regarding the change in Project Coordinator (Mr. Chase Fortenberry) and primary consultant (AMEC Environment & Infrastructure, Inc. [AMEC]) for the work as required under paragraph 28 and 31 of the February 2007 AOC for RI/FS (Docket No. V-W-07-C-864).
- On March 29, 2013, Georgia-Pacific forwarded to USEPA AMEC's *Quality Management Plan* as required under paragraph 27a of the February 2007 AOC for RI/FS (Docket No. V-W-07-C-864).
- In April 2013, Work Groups were established with USEPA and MDEQ, their consultants, Georgia-Pacific, and AMEC to reach agreement on approaches for SWAC and fish trending evaluations.
- On May 23, 2013, Georgia-Pacific submitted AMEC's certificate of professional liability insurance to the USEPA.
- On July 11, 2013, AMEC and Georgia-Pacific submitted AMEC's *Site-Specific Health and Safety Plan (HASP)* to USEPA, which was prepared to facilitate river-wide SRI/FS activities at the site.
- On July 12, 2013, Georgia-Pacific submitted a letter to USEPA describing the revised sample identification nomenclature system which would be used for SRI/FS sampling activities beginning with the activities outlined in the *Area 3 SRI/FS Supplemental FSP*.
- In accordance with Exhibit A, Section D of the SOW associated with the February 2007 AOC for RI/FS, an evaluation and update of the project master schedule has been prepared and is attached to this semi-annual progress report.

Area 1

- On February 5, 2013, USEPA provided ARCADIS with disapproval and associated comments on the *Draft Area 1 FS Report*.
- On February 15, 2013, the MDEQ provided ARCADIS with comments on the *Draft Area 1 FS Report*.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #13, FEBRUARY 2013 TO JULY 2013

- On February 22, 2013, Georgia-Pacific forwarded to USEPA *Addendum 2 to Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2012 Bank Conditions Monitoring Report*.
- On February 28, 2013, the Michigan Department of Attorney General's office wrote to USEPA regarding the upcoming on-site inspection of the former Plainwell Impoundment and bank erosion issues.
- On March 5, 2013, the USEPA wrote to the Michigan Department of Attorney General regarding the former Plainwell Impoundment on-site inspection. This inspection was performed on June 11, 2013 as per paragraph 15h of the 2007 AOC for Removal Action (Docket No. V-W-07-C-863).
- On March 14, 2013, ARCADIS forwarded to USEPA and MDEQ two documents regarding Area 1 surface-weighted average concentration (SWAC) calculations.
- On March 20, 2013, Georgia-Pacific submitted to USEPA a request to extend the 45-day response period to allow appropriate time to address the comments received on the *Draft Area 1 FS Report*, dated February 5, 2013.
- On March 21, 2013, USEPA notified Georgia-Pacific by email of its approval of a 60-day extension of the *Draft Area 1 FS Report* response period.
- On April 1, 2013, Georgia-Pacific received formal notification from USEPA that a 60-day extension of the *Draft Area 1 FS Report* response period had been granted.
- On April 3, 2013 a meeting was held in Chicago with USEPA and MDEQ to discuss comments received on the *Draft Area 1 FS Report*.
- The April 30, 2013 Plainwell Final Inspection was postponed to June 11, 2013 due to high water levels.
- On May 9, 2013, Georgia-Pacific and AMEC met with USEPA and MDEQ (i.e. "Work Group") to agree upon methodologies related to Area 1 SWAC calculation and fish trend analysis.
- On May 10, 2013, Georgia-Pacific and AMEC met with USEPA and MDEQ to agree on the response to the *Area 1 FS Report* comments.
- On May 17, 2013, Georgia-Pacific submitted a request to extend the Area 1 revised FS due date to July 29, 2013.
- On May 23, 2013, Georgia-Pacific received formal notification from USEPA that the schedule extension for the Area 1 revised FS requested on May 17, 2013 had been granted.
- On May 31, 2013, Georgia-Pacific and USEPA discussed the addition of Toxic Substances Control Act (TSCA) criteria as an Applicable or Relevant and Appropriate Requirement (ARAR) to the Area 1 FS. The parties agreed that TSCA would be added as an ARAR with the understanding that the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) risk assessment process should meet the requirements of the TSCA program as it relates to polychlorinated biphenyl (PCB) contamination left in place.
- Area 1 SWAC calculation methodologies and fish trend analysis were agreed upon and completed by the project Work Group in May 2013.
- On June 11, 2013, Georgia-Pacific met with USEPA, MDEQ, MDNR and USFWS to conduct the former Plainwell Impoundment final TCRA inspection and the Plainwell No. 2 Dam Area annual bank inspection. Observations made during the former Plainwell Impoundment

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #13, FEBRUARY 2013 TO JULY 2013

inspection include the apparent degradation of a portion of the angular rock armor installed in Removal Areas (RA) 5A and 6B during December 2012 and apparent poor survival of the non-willow live stakes planted in RA-6B. Four areas of the Plainwell No. 2 Dam Area (portions of RA-2A, RA-3A, RA-4A, and RA-4B) were observed to have experienced some erosion since the 2012 inspection and will require some follow up monitoring and evaluation for possible repairs. Survey transects for the four sections are to be included in the draft Bank Conditions Monitoring Report.

- The revised *Draft Area 1 FS* was submitted electronically to USEPA on July 29, 2013 with paper copies mailed on July 30, 2013.

Area 2

- On April 8, 2013, USEPA provided Georgia-Pacific with notification of disapproval of the draft *Area 2 SRI Report* which included USEPA comments. MDEQ comments were received by Georgia-Pacific on April 12, 2013.
- On May 17, 2013, Georgia-Pacific submitted a request to extend the Area 2 revised SRI due date to September 20, 2013. On May 23, 2013, Georgia-Pacific received formal notification from USEPA that the schedule extension for the Area 2 revised SRI requested on May 17, 2013 had been granted. The revised submittal date is September 20, 2013.
- In June 2013, the project Work Group transitioned to Area 2. Periodic meetings during June and July 2013 is continuing to demonstrate progress with respect to Area 2 SWAC calculation methodologies.

Area 3

- On February 11, 2013, ARCADIS forwarded to USEPA Area 3 data map figures.
- On March 19, 2013, USEPA, MDEQ, Georgia-Pacific, ARCADIS, and AMEC participated in a conference call to discuss the additional data needed from the residential areas to complete the *Area 3 SRI Report*. Advance materials for the call (recon notes from the 2012 field sampling activity and a proposal for the additional samples) were provided to participants by ARCADIS on March 15, 2013. MDEQ provided their field notes on March 25, 2013.
- On May 10, 2013, Georgia-Pacific and AMEC met with USEPA and MDEQ to discuss Area 3 proposed residential incremental sampling approach.
- On June 13, 2013, Georgia-Pacific submitted the revised *Area 3 SRI/FS Work Plan and Supplemental Field Sampling Plan (FSP)* for agency review.
- On June 27, 2013, Georgia-Pacific and AMEC received MDEQ comments, via email, regarding the *Area 3 SRI/FS Supplemental FSP*.
- On July 2, 2013, Georgia-Pacific, AMEC, USEPA, and MDEQ attended a conference call to discuss the *Area 3 SRI/FS Supplemental FSP* comments which were received via email from MDEQ on June 27, 2013.
- On July 8, 2013, Georgia-Pacific received USEPA approval of the revised *Area 3 SRI/FS Supplemental FSP*.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #13, FEBRUARY 2013 TO JULY 2013

- On July 9, 2013, AMEC, on behalf of Georgia-Pacific, submitted an email to USEPA and MDEQ which contained responses to the June 27, 2013 MDEQ *Area 3 SRI/FS Supplemental FSP* comments.
- In July 2013, AMEC secured access agreements with multiple residential properties within Area 3 and with US Gypsum for the island near the Otsego Paper facility located at the eastern end of Area 3.
- Field activities outlined in the revised *Area 3 SRI/FS Work Plan and Supplemental FSP* were initiated on July 15, 2013.

Area 4

- On February 27, 2013, USEPA forwarded to ARCADIS disapproval and comments on the *Area 4 SRI/FS Work Plan*.
- On February 28, 2013, MDEQ forwarded to ARCADIS comments on the *Area 4 SRI/FS Work Plan*.
- On April 26, 2013, Georgia-Pacific submitted the revised *Area 4 SRI/FS Work Plan* to USEPA.
- On June 17, 2013, Georgia-Pacific received conditional approval of the revised *Area 4 SRI/FS Work Plan*.

